

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)
This document relates to:
World Trade Center
Properties LLC, et al. v.
United Airlines, Inc. et al.,
08 Civ. 3719; and
World Trade Center
Properties, LLC et al. v.
American Airlines, Inc., et
al., 08 Civ. 3722

**DEFENDANT ICTS INTERNATIONAL N.V.'S
RESPONSE TO WTCP PLAINTIFFS' RULE 56.1
COUNTER-STATEMENT OF MATERIAL FACTS**

Pursuant to Rule 56.1 of the Local Rules of the United States District Court for the Southern District of New York, defendant ICTS International, N.V. ("ICTS") submits the following response to WTCP Plaintiffs' counter-statement of material facts.

WTCP Plaintiffs' Statement Paragraph No. 12:

12. At a meeting in Israel, Yosef Yahav, VP International of ICTS hired Richard Sporn as part of Huntleigh's management team. Mr. Yahav was not an employee of Huntleigh. (Transcript of Deposition Testimony of Richard Sporn ("Sporn Tr.", Exhibit 3 to the Cohen Affidavit), at 15-16).

ICTS Response to Paragraph No. 12:

ICTS disputes that Mr. Yahav hired Mr. Sporn. Huntleigh hired Mr. Sporn. (Sporn Tr. at 7.)

WTCP Plaintiffs' Statement Paragraph No. 13:

13. Mr. Sporn had been an employee of a subsidiary of ICTS in Austria and previously worked for ICTS-USA in the United States. Sporn Tr. at 15, 27-28, 34-35.

ICTS Response to Paragraph No. 13:

ICTS does not dispute the factual allegations made in this paragraph.

WTCP Plaintiffs' Statement Paragraph No. 14:

14. Mr. Sporn began working at Huntleigh in October 2000. His job description was "painted in broad strokes." Sporn Tr. at 7, 15.

ICTS Response to Paragraph No. 14:

ICTS does not dispute the factual allegations made in this paragraph.

WTCP Plaintiffs' Statement Paragraph No. 15:

15. Mr. Sporn initially reported to Joseph Tuero who held the position of CEO of Huntleigh.

ICTS Response to Paragraph No. 15:

ICTS does not dispute the factual allegations made in this paragraph.

WTCP Plaintiffs' Statement Paragraph No. 16:

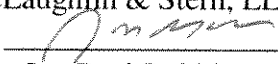
16. Mr. Sporn became the next CEO and President of Huntleigh, replacing Mr. Tuero. Sporn Tr. at 7.

ICTS Response to Paragraph No. 16:

ICTS does not dispute the factual allegations made in this paragraph, but states that Mr.

Sporn did not replace Mr. Tuero until June 2005. Sporn Tr. at 7.

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